

TOXIC SUBSTANCES CONTROL ACT
RECEIPT FOR SAMPLES AND DOCUMENTS

1. INVESTIGATION IDENTIFICATION			2. COMPANY NAME
DATE	INSPECTION NO.	DAILY SEQ. NO.	Clara Barton Elementary School
	23828		
3. INSPECTOR ADDRESS USEPA Region III Mail Code BWC32 1650 Arch Street Philadelphia, PA 19103			4. COMPANY ADDRESS 5 Blue Lake Road Levittown, PA 19052-3017


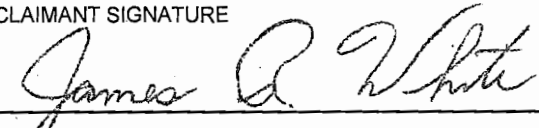
For internal EPA use. Copies of this form may be provided to recipient as acknowledgment of the documents and samples of chemical substances and/or n described below collected in connection with the administration and enforcement of the Toxic Substances Control Act.

RECEIPT OF DOCUMENT(S) AND/OR SAMPLE(S) DESCRIBED IS HEREBY ACKNOWLEDGED:

NO.	DESCRIPTION
①	Six bulk samples collected from Rooms 8, 9, And 11
②	Copies of "AHERA Reinspection Findings + Recommendations Dated 12-22-97

OPTIONAL:

DUPLICATE OR SPLIT SAMPLES: REQUESTED AND PROVIDED ☐NOT REQUESTED ☐

INSPECTOR SIGNATURE 		CLAIMANT SIGNATURE 	
NAME Stephen Forost, At		NAME James R. White	
TITLE Compliance Officer	DATE SIGNED 2-22-07	TITLE Operations Coordinator	DATE SIGNED 2/22/07

NOTICE OF INSPECTION

1. INVESTIGATION IDENTIFICATION			3. FACILITY NAME
DATE 2/22/2007	INSPECTION NO. 23828	DAILY SEQ. NO. ①	Clara Barton Elementary School
2. INSPECTOR'S ADDRESS 1650 Arch Street (3WC32) Philadelphia, PA 19103			4. FACILITY ADDRESS 5 Blue Lake Road Levittown, PA 19057-3017

For Internal EPA Use. Copies may be provided to recipient as acknowledgment of this notice.

REASON FOR INSPECTION

Under the authority of Section 11 of the Toxic Substances Control Act:

- ☒ For the purpose of inspecting (including taking samples, photographs, statements, and other inspection activities) an establishment, facility, or other premises in which chemical substances or mixtures, articles containing same are manufactured, processed, stored or held before or after their distribution in commerce (including records, files, papers, processes, controls, and facilities) and any conveyances being used to transport chemical substances, mixtures, or articles containing same in connection with their distribution in commerce (including records, files, papers, processes, controls, and facilities) bearing on whether the requirements of the Act are applicable to the chemical substances, mixtures, or articles within, or associated with, such premise or conveyance have been complied with.

☐ In addition, this inspection extends to (check appropriate blocks):

- | | |
|--|--|
| <input type="checkbox"/> A. Financial data | <input type="checkbox"/> D. Personnel data |
| <input type="checkbox"/> B. Sales data | <input type="checkbox"/> E. Research data |
| <input type="checkbox"/> C. Pricing data | |

The nature and extent of inspection of such data specified in A through E above is as follows:

Complaint Unaccredited workers removing asbestos-containing floor tiles

INSPECTOR'S SIGNATURE <i>Stephen Forostiat</i>		RECIPIENT'S SIGNATURE <i>James R. White</i>	
NAME Stephen Forostiat		NAME James R. White	
TITLE Compliance Officer	DATE SIGNED 2/22/07	TITLE Operations Coordinator	DATE SIGNED 2-22-07



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

TSCA Inspection
Summary of Observations

Name and Address of Inspector Stephen Forostiak US EPA Region III 1650 Arch Street, 3WC32 Philadelphia, PA 19103	Name and Address of Facility Clara Barton 5 Blue Lake Rd Levittown, PA 19057-3017 Chief Executive Officer of Firm Ellen Budman Title Acting Superintendent Address 6401 Mill Creek Road Levittown, PA 19057-4014
Name of Individual to Whom Notice is Given James White	
Title Operations Safety Environmental Training Coordinator Date 2-22-07	

The following potential deviations from the requirements of the Toxic Substances Control Act and regulations promulgated thereto were observed during this inspection:

- ☐ LEA APPEARS to be in compliance with AHERA.
- ☒ LEA failed to conduct an AHERA inspection or reinspection pursuant to 40 CFR part 763.
- ☐ LEA failed to develop a management plan pursuant to 40 CFR part 763.
- ☐ LEA knowingly submitted false information to Governor regarding the inspection report.
- ☐ LEA carried out removal/renovation activities while operating under a deferral.
- ☐ LEA knowingly submitted false information to the Governor regarding the deferral request.
- ☒ LEA failed to use accredited persons.
- ☒ LEA failed to provide initial or annual notifications to parents/teachers/employee organizations.
- ☐ LEA failed to notify short term workers.
- ☒ LEA failed to conduct periodic surveillance.
- ☒ LEA failed to maintain required records.
- ☒ LEA failed to ensure proper compliance of response action.
- ☐ LEA failed to provide training for the designated person, custodial or maintenance staff.
- ☐ LEA failed to post warnings
- ☐ LEA failed to qualify for an AHERA exclusion and
- ☐ Other: _____

This Summary of Observations is provided to bring to your attention those areas of concerns at the earliest possible time. It is not intended to be a complete list of potential deviations from the requirements of the Toxic Substances Control Act and regulations thereto, but rather a list of those conditions of immediate concern and/or those readily apparent.

The undersigned acknowledges having received and read a copy of this TSCA Summary of Observations.

Signature James A. White	Title Operations Coordinator Date 2/22/07
Signature of Inspector Stephen Forostiak	Title of Inspector Compliance Officer Date 2-22-07





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

AHERA COMPLIANCE INSPECTION

Inspector Name: Stephen Forostiak
Inspector Number: 23828

Inspection Date: 2/22/07

Local Education Agency Information (LEA)

Name: Bristol Township School District

Address: Administrative offices
6601 Mill Creek Road
Levittown, PA 19057

Superintendent/Headmaster: Ellen Budman Phone#: _____
School Board President: _____ Phone#: _____

Designated Person: James White Date designated: 2/1/1990

LEA number of: _____
Schools: 13 Students: 6500 Employees: @ 500

LEA is(circle) Public Private

Credentials presented to: James White

Reason For Inspection of LEA: The purpose of this inspection is to determine if the LEA is in compliance with the requirements of the Asbestos Hazard Emergency Response Act (AHERA), codified in 40 CFR Part 763, Subpart E.

AHERA Inspection:

- ☐ Randomly Selected Neutral Inspection
☒ Selected for Cause
☒ Complaint (Employee, Parent, Other)
☐ Referral From other Federal or State Agency
☐ Other (specify) _____

☐ Worker Protection Inspection: If response action performed by public school employees (Separate Report)

Preinspection Review: (Obtain from Regional Office Files)

Previous Inspection Date(s) 11/1994, _____, _____, _____, _____, _____
Reason for Inspection 3 year re-insp

Previous Citations, if any related to inadequate(circle):

inspection, sampling, analysis, warnings& notifications, record keeping, other _____

"NOTICE OF INSPECTION" EPA Form 7740-3:



Printed on 100% recycled/recyclable paper with 100% post-consumer fiber and process chlorine free.
Customer Service Hotline: 1-800-438-2474

Signed by LEA representative

(Yes)

No (explain) _____

Copy provided to representative

(Yes)

No (explain) _____

OPENING CONFERENCE

LEA representatives present

NAME	TITLE	PHONE #
James White	Designated Person	Operations Safety Env. Train Co. (215)-785-180
James N. Anders Jr		
Cathy Karasakal	Principal	

Conference Questions

- Does LEA have a management plan (MP) for each school building? (Yes) No
- Does each school have updated copies of MP(s)? ? Yes No
- Amount of ACBM ranges:
☒ >3000 square feet or >1000 linear feet
 ☐ <3000 but >160sqft or <1000 but >260lft
 ☐ <160sqft or <260lft
- Are parents, teachers, and employee organizations notified of MP's availability & all asbestos activities? Yes (No)
- How often are these notifications and by what medium (news paper, mailers, etc.)? Mr. White unsure
note is every fr
- Does the LEA perform surveillance on the ACBM's condition in each school? only flow the present flow Yes (No)
- How often? mt
- Are school buildings reinspected? last reinspection 11-1994 Yes No
- How often? mt
- What training has the designated person received? Asbestos abatement Course 4 day
Egg Industrial
- Are there records to support this? Certificate # BW-048 Yes No
- Who of the LEA's maintenance staff received training and what type? 2 hr awareness
all maintenance
- Where are these records kept? Not known where records are
- Have asbestos response actions been performed since 1987? (Yes) No
- Review Record Keeping[40 CFR 763.94...]
 • Are records for preventative measures & response actions kept in centralized location in the administrative office of both the school & the LEA as part of the MP. Yes (No)

• Is there a description of methods used

no actual removed

Yes

Yes

N

N

• Location of action given

Yes

N

Comments:

Partial inspection stated 80 fittings TSL

Misc. VAT 49000 ft² + gaskets

Original inspection SK9, Beige floor tile 3% As
was sampled from Run 12

Last Reinspection seems to be 1997 by EHS

Inspector's signature:

Date:

/ /

SCHOOL INSPECTION

Date of Inspection: _____

School Name & address: clara

Principal: _____

Phone #: _____

Number of occupants?

Students: 509

Employees: 40

If school building(s) leased, list the owner's name and address:

Contact person: _____

Phone#: () _____

Total number of buildings _____

Grades(i.e., k, k-12) _____

Building	Construction date	Incl. in MP		If no. Date first used as a scho
		Y	N	

Location of MP: Not on site, Mr. White travels

MANAGEMENT PLAN INFORMATION

Is Management Plan available?

☒ Yes

No(explain): _____

Date of MP: 1988

Company name/address:

Eagle Indust Hygiene Assoc, Inc
405 Masons Mill Rd
Hunting Valley PA 19006

Date of inspection: 5/27/28/1988

Inspector(s): Charles Hyder

Accreditation State & No.: #61 -016

(List training info on back of this sheet)

Accreditation State & No.: _____

Person developed by: Keith Crawford

Accreditation State & No.: MP-138

(List training info on back of this sheet)

List training information for all persons involved with inspections and management plan development

1. What type and amount of Asbestos-Containing Building Material (ACBM) is located in LEA's school building(s) (Obtain copies from management plan)? VAT & Pillars

2. Are training records for all maintenance and custodial staff included with the MP?

Yes

☒ No

3. Are state accreditation or training records for all persons involved in major asbestos activities included with the MP?

NA

Yes

No

4. Are periodic surveillance records included with the MP?

Yes

☒ No

not since 9-5-93

2

6. Are reinspection records included with the MP? Yes
7. Were samples collected of surfacing materials? Yes
8. Is Laboratory that performed analysis of bulk sample(s) accredited (NVLAP). Yes N
9. List the NVLAP accreditation number the NVLAP # 3363
10. If yes to question 7, were the appropriate number of samples taken? MA

3 from each Homogeneous Area $\leq 1,000$ sqft	Yes	No
5 from each Homogeneous Area $> 1,000$ sqft but $< 5,000$ sqft	Yes	No
7 from each Homogeneous Area $> 5,000$ sqft	Yes	No
11. List and or obtain copies from each reinspection performed (use the back of this sheet or separate sheet of paper):
 - date of inspection,
 - firm name and address,
 - inspector(s) name, accreditation state/number, & training information
 - management planner's name, accreditation state/number, & training information
12. Review inspection/reinspections condition assessments for ACBM.
Is any ACBM listed as significantly damaged or damaged? Yes No
13. If yes to question to question 12,
 - Did the management planner make recommendations for response actions? oatm Yes No
 - Did the LEA complete these response actions in the time frame suggested? Yes No
 - Are there records documenting these response actions? Yes No
14. Perform a walk through of each functional space (room/location) that was identified with ACBM.
15. Verify that response actions address the recommendations of the management planer.

Floor tile removal usually for loose tile

Inspector's signature:

Date: / /